

# **EXHIBIT A**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

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SHENZHENSHI HAITIECHENG )  
SCIENCE AND TECHNOLOGY CO., )  
LTD., a People's Republic of )  
China corporation, )  
)  
Plaintiff, )  
)  
v. ) Case No.  
) CV-00797 JST (SK)  
)  
VIRTUE GLOBAL HOLDINGS )  
LIMITED, a business company )  
incorporated in the British )  
Virgin Islands, )  
)  
Intervenor. )  
)  
)  
REARDEN, LLC, a California )  
Limited Liability Company; )  
REARDEN MOVA, LLC, a LLC, a )  
California Limited Liability )  
Company; and MOVA, LLC, a )  
California Limited Liability )  
Company, )  
)  
Defendants. )  
)  
)  
\_\_\_\_\_)  
AND RELATED COUNTERCLAIMS )  
\_\_\_\_\_)

DUE TO COVID-19 PANDEMIC RULES, THIS REMOTE HEARING WAS  
CONDUCTED VIA ZOOM CONFERENCING  
BEFORE THE HONORABLE SPECIAL MASTER MARTIN QUINN  
Thursday, September 24, 2020

REPORTED BY: TERESA KENWORTHY, CSR No. 6673

1 have questions. I don't want just rambling comments.  
2 But if you have questions, clarifying questions or  
3 something of counsel --

4 MR. SCHULMAN: I thought that the parties had  
5 stipulated that the .MA files were -- contained  
6 sufficient amounts of software that they would be  
7 returnable. I'm not sure exactly what I said.

8 Ben, I thought you could agree that the .MA files  
9 were to be treated as software given that they do  
10 contain not only but very significant amounts of source  
11 code in them, they may also contain the seeds. It's  
12 just a question of are .MA files returnable in dispute.

13 MR. KLEINMAN: They are. And so .MEL files are  
14 not in dispute. I think .MA files -- and it is  
15 possible that I confused .MA and .MEL or got confused  
16 in the thread or wasn't aware of the difference at the  
17 time. But the .MA files, as you say, contain -- if  
18 they also contain source code, I'm not fully aware of  
19 that, but they for sure contain the output of the  
20 scene.

21 MR. SCHULMAN: Fine. I just wanted to know if  
22 there was still a question about that.

23 Let me just note one factual thing, which is that  
24 the post-injunction Beast output goes extensively  
25 through at least most of July. And so it is not only of

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AND RELATED COUNTERCLAIMS ) REPORTER'S CERTIFICATE

I, TERESA KENWORTHY, Certified Shorthand  
Reporter of the State of California, do hereby certify  
that the foregoing pages 1 through 59, inclusive,  
comprises a true and correct transcript of the  
proceedings had in the above-entitled matter held on  
September 24, 2020.

IN WITNESS WHEREOF, I have subscribed this  
certificate at Auburn, California on October 12, 2020.

  
TERESA KENWORTHY, CSR No. 6673